

REMARKS

Claims 2, 3, 19 and 23-26 and 28-37 are pending. Claims 2, 3, 19, 23-26 and 28 are amended and claim 27 is hereby canceled. New claims 29-37 are added.

Claim 2 and all dependent claims were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Favorable reconsideration is requested in view of the amendments presented herein.

The Examiner states that the term “plug” cannot be found in the specification, and that there is no support in applicant’s specification for the limitation of “forming a conductive plug of the conductive material” and the limitation of “forming over the third insulation film an interconnection pattern connected to the conductive plug”. The Examiner also states claim 2, as amended, requires the fifth film to be over the interconnection pattern which is above the fourth film, in the specification the fifth insulation film is on the fourth insulation film, not over the interconnection pattern.

According to the above amendments of claim 2, the term “conductive plug” is changed to “contact conducting film” as recited in the applicant’s specification. The “contact conducting film” corresponds to, e.g., the contact conducting film 44 in FIG. 19. The “fifth insulation film” corresponds to, e.g., the inter-layer insulation film 64 in FIG. 19. However, these are not intended to limit the claimed invention to the corresponding embodiment.

Claim 2, 19 and 23-27 were rejected under 35 U.S.C. §102(e) as being anticipated by *Dennison et al.* (US 5,338,700). Favorable reconsideration is earnestly solicited.

Claim 2 has been amended to more distinctly claim the subject matter of the invention. Specifically, the applicant has further defined that the method has at least the features of: “forming a hole reaching down to the conductive region”, “forming a conductive material in the hole to form a contact conducting film of the conductive material, the contact conducting film being electrically connected to the conductive region” and “forming over the fourth insulation film an interconnection pattern electrically connected to the contact conducting film.” These features distinguish over *Dennison et al.*

The Examiner identified that “overlying layer 78” and “conductive capacitor cell layer 70” in FIG. 10 of *Dennison et al.* respectively correspond to “the fifth insulation film” and “conductive plug” in claim 2. However, in *Dennison et al.*, the capacitor cell layer 70 is not connected to the conductive region formed in the semiconductor substrate. The capacitor cell layer 70 of *Dennison et al.* is not for electrically connecting the conductive region and the interconnection pattern. *Dennison et al.* neither teaches nor suggests the contact conducting film formed in the hole and electrically connected to the conductive region and the interconnection pattern. Hence, the noted features, namely “forming a hole reaching down to the conductive region”, “forming a conductive material in the hole to form a contact conducting film of the conductive material, the contact conducting film being electrically connected to the conductive region” and “forming over the fourth insulation film an interconnection pattern electrically connected to the contact conducting film,” are not taught by *Dennison et al.*

Claim 28 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Dennison et al.* in view of *S. Wolf and R. N. Tauber* (Silicon Processing for the VLSI Era, Volume 1-Process Technology, Lattice Press, 1986) (pp. 526-528). *Wolf* fails to provide the teachings which *Dennison et al.* lacks.

If the Examiner believes that this application is not now in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney to arrange for an interview to expedite the disposition of this case.

If this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. The fees for such an extension or any other fees that may be due with respect to this paper may be charged to Deposit Account No. 50-2866.

Respectfully submitted,

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Attachment: RCE Transmittal